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January 31, 2025

VIA ECF

Hon. Victoria Reznik
United States Magistrate Judge
United States Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

**Re: *The Wave Studio, LLC v. General Hotel Management Ltd., et al.*,
Case No. 7-13-cv-09239-CS-VR;**

Dear Judge Reznik:

Plaintiff The Wave Studio, LLC (“Wave”), writes pursuant to the Court’s order on January 27, 2025 (ECF 427) requesting a two-week extension to respond to Defendants’ Joint Letter in Opposition to Plaintiff’s Request for Discovery Related to Early Motions to Dismiss. Plaintiff had been engaged in negotiations with Moving Defendants over whether they would agree to permit Plaintiff to file an amended Master Complaint. Our proposal would have obviated the need for motion practice and discovery, or at least narrow the discovery sought. We received a response late this afternoon via email at 3:50 p.m. EST declining Plaintiff’s proposal.

We now respectfully request two weeks to evaluate whether we will ask this Court for leave to amend – or seek the discovery.

Respectfully Submitted,

Gabriel Berg

Roman Silberfeld
Gabriel Berg
Robins Kaplan LLP
Counsel for Plaintiff